



# Maple Lake Public School

## Independent School District No. 881

200 State Hwy 55 East

District Office P.O. Box 760, Maple Lake, MN 55358-0760

High School P.O. Box 820 Maple Lake, MN 55358-0820

Elementary P.O. Box 788 Maple Lake, MN 55358-0788

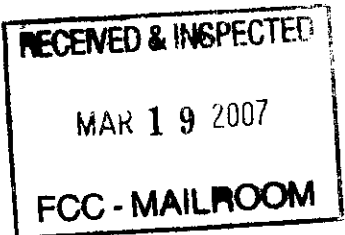
High School (320) 963-3171 - Fax (320) 963-3170

Elementary (320) 963-3024 - Fax (320) 963-6584

## Request for Review

CC Docket No. 02-6

**Mark Redemske**  
Superintendent  
(320) 963-3114  
**Mary James**  
High School Principal  
(320) 963-7505  
**Kris Harlan**  
Elementary Principal  
(320) 963-6018  
**Dave Schroeder**  
Activities Director  
(320) 963-7518



March 5, 2007

To: Federal Communications Commission  
Office of the Secretary  
445 - 12th Street SW  
Room TW-A325  
Washington, DC 20554

From: Randy Benoit  
Maple Lake Public School District  
200 State Highway 55 East  
Maple Lake, MN. 55362.  
Phone (320) 963-7541  
Fax (320) 963-3170  
Email: [BenoitR@maplelake.k12.mn.us](mailto:BenoitR@maplelake.k12.mn.us)

|                              |                                |
|------------------------------|--------------------------------|
| Applicant Name:              | MAPLE LAKE SCHOOL DISTRICT 881 |
| Billed Entity Number:        | 133610                         |
| Form 471 Application Number: | 495303                         |
| Funding Request Number:      | 1364581                        |

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|  |
|--|
| <b>Mark Redemske</b><br>Superintendent<br>(320) 963-3114<br><b>Mary James</b><br>High School Principal<br>(320) 963-7505<br><b>Kris Harlan</b><br>Elementary Principal<br>(320) 963-6018<br><b>Dave Schroeder</b><br>Activities Director<br>(320) 963-7518 |
|--|

From: Randy Benoit  
Maple Lake Public School District  
200 State Highway 55 East  
Maple Lake, MN 55362  
Phone (320) 963-7541  
FAX: (320) 963-3170  
E-mail: [BenoitR@maplelake.k12.mn.us](mailto:BenoitR@maplelake.k12.mn.us)

Applicant Name: MAPLE LAKE SCHOOL DISTRICT 881  
Billed Entity Number: 133610  
Form 471 Application Number: 495303  
Funding Request Number: 1364581

I am requesting that the FCC review the Universal Service Administrative Company Schools and Libraries Division decision on the E-rate application appeal filed for Funding Year 2006-2007. Included is a copy of the letter of appeal that was originally sent to USAC and USAC's response to my appeal.

Funding Request Number 1364581 was originally filed as Telecommunications Services. During the course of the Program Integrity Assurance (PIA) Review, the SLD PIA made the decision to convert the request to Internal Connections since the request included the cost of an eligible voice mail server of \$4,526 that should have been filed under Internal Connections.

At no time did the SLD PIA team contact me to clarify this change or to provide me with the opportunity to make a correction. They simply denied the request based on their "30% rule" which states that if an application contains more than 30% of ineligible products and services, that application is denied without further review.

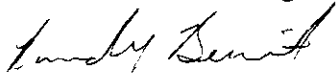
The majority of this funding request is for eligible voice mail services in the amount of \$7,871.40 annually. These are eligible services. The voice mail server, which cost \$4,526 and which should have been filed under Internal Connections is not an ineligible component under the E-rate program. It is eligible, but only under Internal Connections.

The SLD, therefore, has applied the 30% rule for ineligible services to an eligible component that was simply included in the wrong service category.

In applying the 30% rule, I believe the SLD has acted unfairly because 1) they converted the entire request to internal connections without contacting me and 2) applied the 30% rule, which applies to ineligible components. All of the services and products I am requesting on this FRN are eligible for E-rate discounts. In addition, the SLD PIA team could have quite easily contacted me to notify me about the error and give me the opportunity to drop the voice mail server from my request if necessary and approve the remainder of the application for eligible Telecommunications Services.

I believe the SLD has taken unreasonable action on this application and request the FCC to review the attached documentation to determine if at a minimum, the telecommunications services request of \$7,871 might be funded at the amount indicated. Attachment 1 is the original letter of appeal to USCA SLD, attachment 2 is the Administrators decision on appeal's letter.

Your consideration is greatly appreciated.



Randy Benoit  
Technology Coordinator  
Maple Lake Public Schools  
(320)963-7541

MAILED 12-12-06

December 11, 2006

## Letter of Appeal

I wish to appeal the funding decision commitment letter dated November 29, 2006 for Form 471 Application #495303.

Funding Request Number 1364581, which I filed as Telecommunications Services, was changed by USAC staff from Telecommunications Services to Internal Connections. I received no requests for clarifications from the Program Integrity Assurance (PIA) staff regarding this change. A major portion of this funding request is for monthly recurring telephone service, the annual pre-discount amount for eligible recurring service is \$7871.40. The only amount that could be considered internal connections is \$4526 for a voice mail server listed on the same FRN.

It seems to me that SLD should have 1) conferred with me prior to changing the entire request to Internal Connections, and 2) if it determined that the voice mail server was Internal Connections, the remainder of the application should have been approved as Telecommunications Services.

Enclosed is a copy of the funding commitment decision letter and supporting documentation. Thank you for your consideration of this request. If you have any questions, please do not hesitate to contact me.

Randy Benoit

Technology Coordinator  
Maple Lake Public Schools  
200 State Highway 55 East  
Maple Lake, MN. 55358  
Phone: 320-963-3171  
Fax: 320-963-3170  
Email: [BenoitR@maplelake.k12.mn.us](mailto:BenoitR@maplelake.k12.mn.us)

Appellant Name: Randy Benoit      Applicant Name: Maple Lake School District 881  
Service Provider Name: Lakedale Telephone Company      Applicant BEN: 133610  
SPIN Number: 143002109      Form 471 Application Number: 495303

**FUNDING COMMITMENT REPORT**  
**Billed Entity Name: MAPLE LAKE SCHOOL DISTRICT 881**  
**BEN: 133610**  
**Funding Year: 2006**

Form 471 Application Number: 495303  
Funding Request Number: 1364581  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 989160000548318  
SPIN: 143002109  
Service Provider Name: Lakedale Telephone Company  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2006  
Contract Expiration Date: 06/30/2007  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$7,871.40  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$4,526.00  
Pre-discount Amount: \$12,397.40  
Discount Percentage Approved by the USAC: N/A  
Funding Commitment Decision: \$0.00 - Srvc/Discnt will NOT be funded  
Funding Commitment Decision Explanation: Category of service was changed from Telecom Service to Internal Connections. Given demand, the funding cap will not provide for Internal Connections at your approved discount level to be funded. Please see [www.sl.universalservice.org](http://www.sl.universalservice.org) for further details.

FCDL Date: 11/29/2006

Wave Number: 032

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/200

Funding Request Number: 1364584  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 989160000548318  
SPIN: 143005588  
Service Provider Name: CDW-G  
Contract Number: T  
Billing Account Number: N/A  
Service Start Date: 07/01/2006  
Contract Expiration Date: 06/30/2007  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$1,705.03  
Pre-discount Amount: \$1,705.03  
Discount Percentage Approved by the USAC: N/A  
Funding Commitment Decision: \$0.00 - Srvc/Discnt will NOT be funded  
Funding Commitment Decision Explanation: Given demand, the funding cap will not provide for Internal Connections/Basic Maintenance of Internal Connections at your approved discount level to be funded. Please see [www.universalservice.org/sl/](http://www.universalservice.org/sl/)

FCDL Date: 11/29/2006

Wave Number: 032

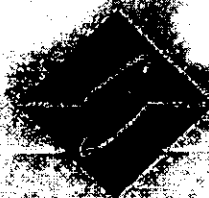
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/200

Entity Number 000013450

Applicant Form 18 471-06-07

Contact Person Randy Reed

Phone Number (320) 274-3171



# LAKEDALE TELEPHONE COMPANY

YOUR TELECOMMUNICATIONS COMPANY

## YEAR 9 (2006-2007) ATTACHMENT #1

December 20, 2005

Randy Reed  
Maple Lake School District 881  
230 State Street  
Maple Lake, MN 55358

Dear Mr. Benoit:

This letter is to provide the information you have requested for completing your filing of the FCC 471 Form relating to the E-rate program.

Lakedale Telephone Company, as of December 22, 2005, is billing the Maple Lake School District 881, the following monthly charges:

|                           |          |
|---------------------------|----------|
| Local Services            | \$507.00 |
| D81 Circuit for DID lines | \$217.71 |

If these figures do not match what you show, please do not hesitate to contact us at 320-274-2985.

Sincerely,

  
Dan Reed  
Service Department Supervisor  
Lakedale Telephone Company

Entity Number 0000133610  
Contact Person Randy Benoit

Applicant Form ID 471-06-07  
Phone Number (320)9633171

**Year 9 (2006-2007)**  
**Attachment #2**  
**Long Distance Cost Worksheet**

| Month     | Minutes | Monthly cost | Average cost/minutes in cents |
|-----------|---------|--------------|-------------------------------|
| January   | 624     | 57.66        | 9.2                           |
| February  | 887     | 80.10        | 9.0                           |
| March     | 625     | 58.95        | 9.4                           |
| April     | 847     | 77.23        | 9.1                           |
| May       | 1194    | 108.73       | 9.1                           |
| June      | 666     | 60.45        | 9.1                           |
| July      | 380     | 34.27        | 9.0                           |
| August    | 534     | 49.66        | 9.3                           |
| September | 862     | 77.85        | 9.0                           |
| October   | 1207    | 109.01       | 9.0                           |
| November  | 723     | 66.73        | 9.2                           |
| December  | 736     | 67.21        | 9.1                           |

**Total Annual Minutes 9285**

**Estimated long distance telephone costs**

9285 (total annual minutes) X 9.13 (average cents per minute) = \$847.72

**Average monthly charge = \$70.64 (847.72/12)**

| Quantity  | Description of product or service | Unit cost | Extended cost |               | Reference attachment |
|-----------|-----------------------------------|-----------|---------------|---------------|----------------------|
|           |                                   |           | Recurring     | Non-Recurring |                      |
| 12 months | Local Telephone service           | \$367.60  | \$4411.20     | \$0           | Attachment #1        |
| 12 months | DS1 circuit for DID               | \$217.71  | \$2612.52     | \$0           | Attachment #1        |
| 12 months | Long Distance Telephone Service   | \$70.64   | \$847.68      | \$0           | Attachment #2        |
| 1 unit    | Voicemail Series 3000 core server | \$2425.00 | \$0           | \$2425.00     | Attachment #4        |
| 1 unit    | Voicemail Software 4.3            | \$2101.00 | \$0           | \$2101.00     | Attachment #4        |

Entity Number 0000133610  
Contact Person Randy Benoit

Applicant Form ID 471-06-07  
Phone Number (320)9633171

**Year 9 (2006-2007)**  
**Attachment #3**

**Discount Rate for Shared Services**

| School     | # of Students | # of eligible NSLP | Discount Rate from matrix |
|------------|---------------|--------------------|---------------------------|
| Secondary  | 483           | 82                 | 40%                       |
| Elementary | 466           | 82                 | 40%                       |

$$483 \times 40\% = 193$$

$$466 \times 40\% = 186$$

$$193 + 186 = 379$$

$$379 / 949 = 40\%$$



Entry Number 0000133610  
Contact Person Randy Reed

Applicant Form IS 471-06-07  
Phone Number (320) 5637171

# COMMUNICATIONS SALES & LEASING, INC. YOUR TELECOMMUNICATIONS COMPANY

## YEAR 9 (2006-2007) ATTACHMENT #4 VOICEMAIL SERVER QUOTE

November 10, 2005

Randy Reed  
Ind. School District #2601  
PO Box 620  
Maple Lake, MN 55358

Prepared By: Elmer Hansen  
Quotation: To upgrade Series 3000 Voice Mail system to Software Release 4.3  
Replace core system

| Equipment |                    |            |                    |
|-----------|--------------------|------------|--------------------|
| Qty       | Description        | Unit Price | Total Price        |
| 1         | Series 3000 Core   |            | \$ 5,475.00        |
| 1         | Software 4.3       |            | \$ 2,391.00        |
|           | <b>TOTAL TOTAL</b> |            | <b>\$ 7,866.00</b> |



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2006-2007**

February 26, 2007

Randy Benoit  
Maple Lake Public School  
Independent School District 881  
200 State Hwy 55 East  
Maple Lake, MN 55358

Re: Applicant Name: MAPLE LAKE SCHOOL DISTRICT 881  
Billed Entity Number: 133610  
Form 471 Application Number: 495303  
Funding Request Number(s): 1364581  
Your Correspondence Dated: December 11, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2006 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1364581  
Decision on Appeal: **Denied**  
Explanation:

- Upon review of the letter of appeal and all relevant documentation, it has been determined that this funding requested included a request for telephone local, long distance, and DS1 circuit charges of \$655.95 per month. In addition, the request also included a one-time charge of \$4526.00 for a voicemail server and related software. This funding request was filed in the category of Telecom Services, however, the voicemail server and software are clearly Internal Connections. Therefore, the Program Rules for a mixed category request were applied. The Internal Connections portion was calculated as representing more than 30% of the total request, since \$4526 is 36.5% of the total FRN amount of \$12,397.40. Based on Program Rules, the entire funding request was reviewed for eligibility under the Internal Connections category with no requirement to notify you of this

change in service category. The USAC funding cap for Internal Connections services or equipment was the applicant discount level of 60%. Your discount eligibility level is 40%. In your appeal letter, you have suggested that the servers should have been removed and the remaining telecommunication services been funded. However, since your request contained over 30% in Internal Connection products, this is not a possibility within the program rules. If the voicemail servers had been removed in an attempt to leave the FRN in the Telecommunication Services category, the FRN would still have been denied for have 30% ineligible products or services, since the voicemail server and software would have been considered ineligible products within the Telecommunication Services category. Based on the documentation in the record, USAC supports the decision to deny this funding request. You have failed to provide evidence that USAC erred in its initial decision; consequently, the appeal is denied.

- You filed a Form 471 as an individual applicant seeking funding for Telecommunication Services. However, the funding request was reclassified as Internal Connections in accordance with E-Rate program rules. You indicated on your Form 471 that your discount eligibility is 40%. Because you filed as an individual school or library, your discount level is determined by the discount matrix. For Funding Year 2006, there are not sufficient funds to provide Internal Connections discounts to applicants at your discount rate. Consequently, USAC denies your appeal because, given demand, the funding cap will not provide for Internal Connections to be funded at your approved discount level.
- FCC Rules require that where demand for funding exceeds available support, first priority be given to requests for Telecommunications Services and Internet Access. 47 C.F.R. sec. 54.507(g)(1)(i). FCC Rules further require that requests for Internal Connections be given second priority, and be funded only if funds remain after support has been reserved for Telecommunications and Internet Access through all discount levels in a funding year. 47 C.F.R. sec. 54.507(g)(1)(ii). Where demand for discounts for Internal Connections exceeds available support, FCC Rules require that funding be allocated to the most economically disadvantaged schools and libraries as determined by the matrix. 47 C.F.R. secs. 54.505(c), 54.507(g)(1)(ii). Pursuant to the matrix, funds are allocated first to applicants eligible for a 90% discount, then to schools and libraries eligible for an 80% discount, and in the same manner until no funds remain. 47 C.F.R. sec. 54.507(g)(1)(ii)-(iii). For schools and libraries that create consortia for the purposes of making funding requests and sharing [products, services, products and services], the discount level is calculated by averaging the applicable discounts of the schools and libraries that are members of the consortia. 47 C.F.R. sec. 54.505(4). Because discount levels for consortia are determined in this manner, the discount levels for shared products and/or services requests are single discount level percentages rather than the broad discount level percentages for individual schools and libraries as determined by the matrix. See Federal-State Joint Board on Universal Service, CC Docket Nos. 97-21 and 96-45, Fifth Order on Reconsideration in CC Docket No. 97-21, Eleventh Order on Reconsideration in CC Docket No. 96-45 and Further Notice of Proposed Rulemaking, 14 FCC Rcd 6033, FCC 99-49 (rel. May 28, 1999). Consequently, where demand for discounts for Internal Connections exceeds available support,

FCC Rules require that funding be awarded first to applicants eligible for a 90 percent discount level, and then at each descending single discount percentage until funds are depleted. 47 C.F.R. sec. 54.507(g)(1)(iii).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

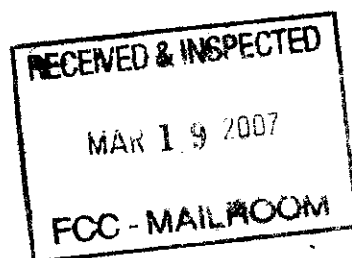
We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

**CERTIFIED MAIL**



220 0002 7419 6092



**MAPLE LAKE PUBLIC SCHOOLS**  
INDEPENDENT SCHOOL DISTRICT 881  
P.O. BOX 820  
MAPLE LAKE, MN 55358-0820

**TO:**  
Federal Communications Commission  
Office of the Secretary  
445-12th Street SW  
Room TW-A325  
Washington, DC 20554

CC Docket No. 02-6

Route  
**Tina**  
Delivery Point  
**TW-B204**

OMD 03/19/07  
PO# 09:42:40  
Sdr MAPLE LAKE PUBLIC SC  
**70993220000274196092**

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